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October 21, 2005

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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Notice of Ex Parte Presentation
WC Docket No. 05-196**

Dear Ms. Dortch:

On October 21, 2005, Bryan Martin, Chairman and CEO of 8x8, Inc. and the undersigned counsel to 8x8, Inc. met with the following members of the Commission staff: Kathy Berthot, Marcy Greene, Colleen Heitkamp, Joseph Casey and Elizabeth Mumaw, all of the Enforcement Bureau; and Christi Shewman, Nicholas Alexander, Jennifer Schneider and Terri Natoli, all of the Competition Policy Division of the Wireline Competition Bureau. The purpose of the meeting was to present 8x8's perspective on the challenges of deploying an E-911 solution for nomadic VoIP subscribers within the timeframe established by the Commission. The attached presentation materials were used during the meeting.

Please refer any questions or correspondence regarding this matter to the undersigned.

Very truly yours,

DLA Piper Rudnick Gray Cary US LLP

/s/

Larry A. Blosser

larry.blosser@dlapiper.com

cc: Terri Natoli, Jennifer Schneider, Nicholas Alexander, Christi Shewman, Elizabeth Mumaw, Joseph Casey, Colleen Heitkamp, Marcy Greene, Kathy Berthot



*Communication for
the Broadband Generation* **1-866-TRY-VOIP**

VoIP E9-1-1 Update 8x8, Inc. (Nasdaq:EGHT)



Bryan R. Martin
Chairman & CEO, 8x8, Inc.
October 21, 2005

hello
bonjour

Hei
aloha
boun giorno

hallo
moshimoshi
hola

Who is 8x8?

- **Founded – 1987**
- **IPO – 1997**
(Nasdaq:EGHT)
- **Packet8 internet telephony service – history**
 - Launched service – www.packet8.net November 2002
 - First \$19.95/month unlimited plan June 2003
 - First unlimited international plan November 2003
 - First Virtual Office business plan March 2004
 - First consumer VoIP E911 offering June 2004
 - First consumer VoIP videophone service June 2004
 - First \$99 videophone / \$19.95/month service (with 2-year plan) April 2005
 - First integrated cordless phone offering July 2005
 - First service outside US – freetalk in UK September 2005





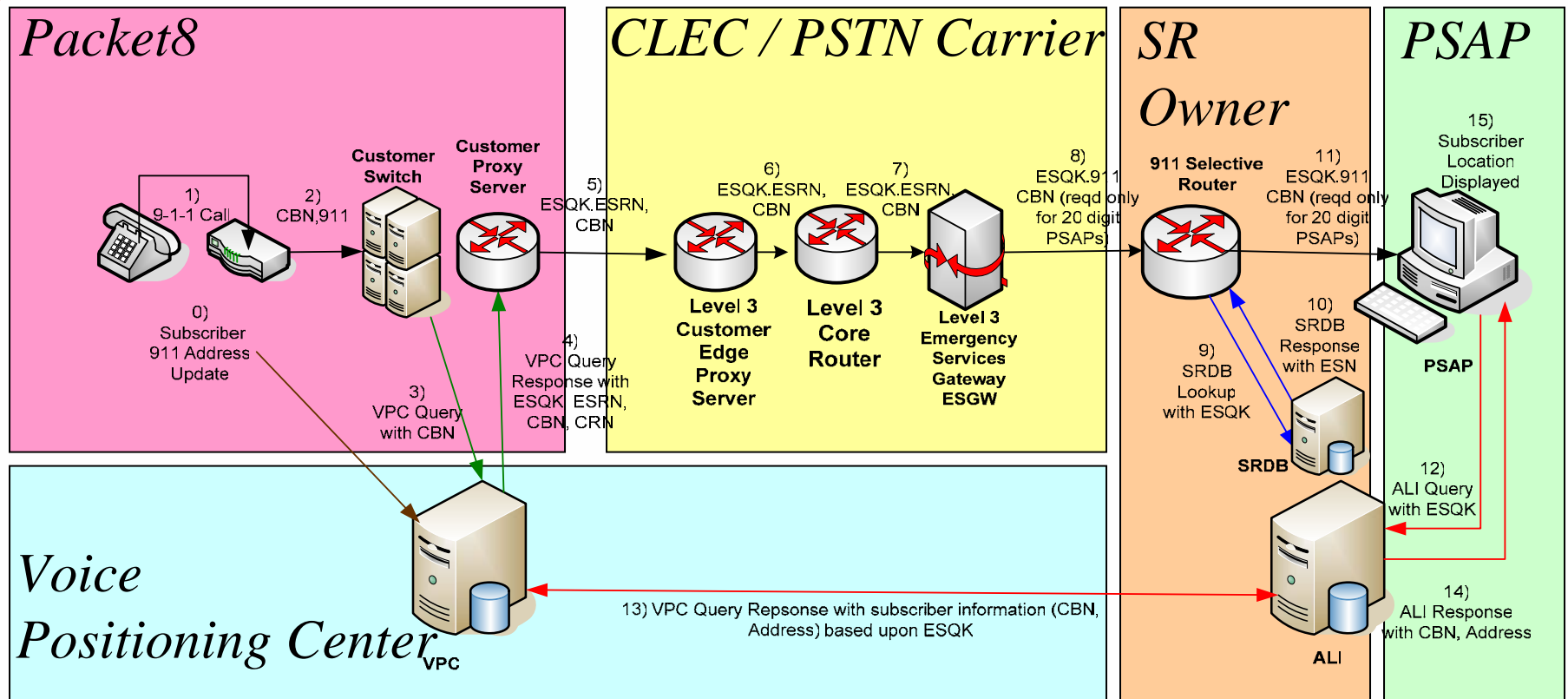
Packet8 and 9-1-1

- **June 2004 - Packet8 was the first VoIP service provider to offer true E911 service to its customers**
- **911 calls are routed to a Public Safety Answering Point (PSAP) call taker**
 - Direct trunking to LEC's selective router with subscriber pop-up information (ALI); fully funded solution which paid PSAP via DID
 - Calls were not routed to 10-digit non-emergency administration lines
 - Caller & location information is delivered to the PSAP call taker
 - Currently available in ~2,200 rate centers (67% of the population)
- **May 2005 FCC ruling for mandatory & nomadic E911**
 - Now faced with customers who are initially provisioned (at time of purchase) with E911 who move to a new location
 - Suspending service while mobile is not reasonable nor "normal"
 - Subscribers are already accustomed to mobility via cellular phones
 - Nomadic requirements lead us to cellular call flows

Packet8

Nomadic VoIP 9-1-1 Call Flow

- Decouples the customer's number from location
- Allows near real-time updates to physical location



- Transparent IP replacement for traditional E911 for most calls

Operator Routing Support Service

- **Use of live Emergency Operator Routing Support Service for:**
 - Calls that involve subscriber location information that is or has become unprovisioned in the VPC database
 - Calls that cannot be routed through the appropriate selective router (either due to lack of connectivity or lack of ALI steering support)
- **Support service is 365x24x7 and employs APCO-certified operators**
- **Support service operator determines caller's location, looks up the number of the appropriate local emergency service, and participates in routing the call to the downstream agency**

Benefits of 911 Support Service

- **The physical location of the caller is verified at the beginning of the call**
 - “911, do you need police, fire or ambulance”
 - “Are you located at <address>?”
 - “Stay on the line while I connect you to the local authorities”
- **Calls are routed to the correct PSAP/responder even if caller is not at the provisioned location**
- **Calls are announced to responders with phone number and address information**
 - Caller and support service operator are both on the line with the downstream agency
 - PSAPs that register a 10-digit contingency routing number with the VPC will receive location information via the support service operator

Special Situations – Support Service

- **No voice contact with 9-1-1 caller**
- **Immediate disconnect, without speaking**
- **Emergency indicated, address and/or phone number are unknown**
- **The procedures to route these calls include VPC's simultaneous escalation to Packet8's Network Operations Center**
 - Any missing phone/address information can be augmented, determined and/or verified from the Packet8 customer record database and order history (including "ship-to" address data)
 - Information is communicated to the downstream agency indicating that the call originated from a Voice over IP phone and may not represent current address or physical location information

Additional Benefits – Support Service

- **Operators are trained to ascertain if alternative 911 communication methods are available**
 - Continue to remain on line with the caller until resolution is achieved via any available alternatives
- **Information is available to 911 callers who are located outside of the United States and Canada**
- **Information is conveyed to callers who are testing/verifying the provisioning of their Packet8 nomadic E911 service**
- **Questions/inquiries from PSAPs are supported**
- **Paves the way for advancement/improvement of the nation's 911 system (NENA/I3)**
 - As opposed to disabling/disconnecting subscribers everytime they move their service

Advantages over disconnection

- **FCC mandatory and nomadic order has created reverse incentives for customers to use VoIP mobility or to notify service provider of the new data**
- **Real world scenarios:**
 - Customer moves a provisioned device and does not update location
 - 8x8 Result → Phone service works without interruption
→ E911 calls routed either to correct PSAP w/ good data via Operator, or incorrect PSAP w/ stale data
 - Disconnection → Phone service is disconnected
→ E911 calls routed to incorrect PSAP w/ bad data
 - Customer moves a provisioned device and updates location to “off-grid” location
 - 8x8 Result → Phone service works without interruption
→ E911 calls routed to correct PSAP w/ good data
 - Disconnection → Phone service is disconnected
→ E911 calls not routable, 9-1-1 disconnected

Open Issues

- **Funding the PSAPs / first responders**
 - In Packet8's previous E911 implementation, E911-enabled phone numbers were tied to the subscriber's physical location and funding was provided via the LEC providing the phone number
 - Phone numbers are no longer physically restricted to a known geography, how does the appropriate downstream agency get paid?
 - How do downstream agencies contacted through the Support Service get paid?
- **Timeline for PSAP outreach, subscriber outreach and education**